

CABLE & COMMUNICATIONS CORPORATION

904 C Avenue P.O. Box 280 Circle, Montana 59215 Ph: (406) 485-3301

February 3, 2006

EB-06-TC-060 EB DOCKET NO. 06-36

CERTIFICATION OF CPNI FILING FEBRUARY 3, 2006

Marlene H. Dortch, Secretary Office of the Secretary Federal Communications Commission 445 12th Street S.W. Washington, DC 20554

Secretary Dortch:

In accordance with the Public Notice issued by the Enforcement Bureau on January 30, 2006, please find attached our company's annual compliance certificate for the most recent period as required by Section 64.2009(e) of the Commission's Rules together with a statement of our company's operating procedures established to ensure compliance with the Commission's Rules and Regulations regarding Customer Proprietary Network Information.

Should you have any questions regarding this filing, please direct them to the undersigned.

All Musikerson
General Manager

Attachments

cc: Bryon McCoy via e-mail byron.mccoy@fcc.gov

Best Copy and Printing, Inc. (BCPI) via e-mail fcc@bcpiweb.com

CERTIFICATE OF COMPLIANCE

Company Names: Mid-Rivers Telephone Cooperative, Inc., and Cable &

Communications Corporation.

Address: 904 C Avenue

Circle, MT 59215

As a corporate officer of these companies, I hereby certify that, based on my personal knowledge, the Companies have established operating procedures that are adequate to ensure compliance with the rules established by the Federal Communications Commission ("FCC") concerning Customer Proprietary Network Information" ("CPNI"), as set forth in Part 64, Subpart U, of the FCC's Rules and Regulations, 47 C.F.R. § 64.2001 *et seq.*, as revised.

The attached Statement demonstrates such compliance.

Gerry Anderson, General Manage

Dated: February 21, 2005

Attachment

STATEMENT

The operating procedures of Mid-Rivers Telephone Cooperative, Inc., and Cable & Communications Corporation are designed to ensure compliance with the CPNI rules applicable to their operations. Such procedures are as follows.

CPNI Use

- (1) We use, disclose or permit access to CPNI to protect our rights and property, our Customers, and other carriers from fraudulent, abusive or unlawful use of, or subscription to, our services.
- (2) We use, disclose or permit access to CPNI to provide or market service offerings among the categories of service – local, interexchange and CMRS -- to which the Customer already subscribes. When we provide different categories of service, and a Customer subscribes to more than one service category, we share the Customer's CPNI with the affiliate that provides service to the Customer; but if a Customer subscribes to only one service category, we do not share the customer's CPNI with an affiliate without the Customer's approval.
- (3) We use, disclose or permit access to CPNI derived from our provision of CMRS for the provision of Customer Premises Equipment (CPE) and information services, without Customer approval.
- (4) We use, disclose or permit access to CPNI derived from our provision of local exchange or interexchange service for the provision of CPE and call answering, voice mail or messaging, voice storage and retrieval services, fax store-and-forward, and protocol conversion, without Customer approval.
- (5) Without Customer approval, we will not use, disclose or permit access to CPNI to provide or market service offerings within a category of service to which the Customer does not already subscribe, except that we use, disclose or permit access to CPNI to: (a) provide inside wiring installation, maintenance and repair services; (b) conduct, when we provide CMRS, research on the health effects of CMRS; and (c) market, when we provide local service or CMRS, services formerly known as adjunct-to-basic services such as, but not limited to, speed dialing, computer-provided directory assistance, all monitoring, call tracing, call blocking, call return, repeat dialing, call tracking, call waiting, caller ID, call forwarding, and certain Centrex features.
- (6) We do not use, disclose or permit access to CPNI to identify or track Customers that call competing service providers. For example, as a local exchange carrier, we do not use local service CPNI to track Customers that call local service competitors.

CPNI Approvals

- (1) When Customer approval to use CPNI is required, we obtain oral approval from the Customer during the course of the inbound telephone call in which the Customer's CPNI will be used. We understand we bear the burden of demonstrating that such approval was given in compliance with the CPNI rules. We maintain all records of Customer approvals for at least one year.
- (2) Upon receipt of oral approval, we use the Customer's individually identifiable CPNI to market communications-related services to that Customer during the call.

CPNI Notice Requirements

- (1) For each inbound call for which we seek Customer approval to use CPNI to market during the call, we inform the Customer of his or her right to restrict the use of CPNI, and we maintain records of that oral notification for at least one year.
- (2) During the call and prior to seeking the customer's consent to use CPNI, we provide information sufficient to enable the Customer to make an informed decision as to whether to permit the use of the CPNI. We: (a) advise that the Customer has a right, and we have a duty, under federal law, to protect the confidentiality of CPNI; (b) specify the types of information that constitute CPNI and the specific entities that will receive CPNI; (c) describe the purposes for which the CPNI will be used; and (d) inform the Customer of his or her right to disapprove those uses and deny or withdraw access to CPNI use at any time. With regard to the latter, we indicate that any approval (or disapproval) will remain in effect until either the Customer affirmatively revokes or limits such approval (or disapproval) or the end of the telephone call, whichever first occurs.
- (3) We advise the Customer of the steps the Customer must take in order to grant or deny access to CPNI, and we clearly state that a denial of approval will not affect the provision of any services to which the Customer subscribes. However, we may provide a brief statement, in clear and neutral language, that describes the consequences directly resulting from the lack of access to CPNI. In addition, we may state that the Customer's consent to use his or her CPNI may enhance our ability to offer products and services tailored to meet the Customer's needs and that we will disclose the Customer's CPNI to any person upon the affirmative written request of the Customer.
- (4) Our oral advisory during the telephone call is comprehensible and not misleading.

(5) We do not include in the advisory any statement that attempts to encourage a Customer to freeze third-party access to CPNI.

CPNI Safeguards

- (1) We have implemented a system by which the status of a Customer's CPNI approval can be clearly established prior to the use of the CPNI.
- (2) We have trained our personnel as to when they are, and are not, authorized to use CPNI, and we have an express disciplinary process in place to deal with employee failures.
- (3) We maintain a record of our sales and marketing campaigns that use Customers' CPNI. The record includes a description of each campaign, the specific CPNI that was used in the campaign, and what products and services were offered as part of the campaign. We retain these records for at least one year.
- (4) We have a corporate officer who acts as agent for the Company and signs a compliance certificate on an annual basis stating that the officer has personal knowledge that the Company has established operating procedures adequate to ensure compliance with applicable CPNI rules. We provide a Statement accompanying the Certificate that explains our operating procedures and demonstrates compliance with the CPNI rules.